

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, ET AL.,  
Plaintiffs,  
v.  
AMERICAN AIRLINES GROUP INC. and  
JETBLUE AIRWAYS CORPORATION,  
Defendants.

Civil Action No. 1:21-cv-11558-LTS

**AMERICAN AIRLINES GROUP INC. AND JETBLUE AIRWAYS CORPORATION'S  
UNOPPOSED MOTION TO SEAL CONFIDENTIAL INFORMATION IN  
DESIGNATED DEPOSITION TESTIMONY**

Defendants American Airlines Group Inc. and JetBlue Airways Corporation (collectively, "Defendants") respectfully move the Court under Local Rule 7.2 and the Stipulated Protective Order (ECF No. 99) for an order to place under seal the limited portions of the deposition transcripts identified in Exhibit A to this Motion. Exhibit A identifies the pages and lines containing Defendants' confidential information in the designated deposition testimony that the parties provided to the Court in hard copy as part of the trial record on September 27, October 13, and October 27, 2022.<sup>1</sup> Pursuant to Local Rule 7.2, Defendants request that the portions of the

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<sup>1</sup> Specifically, Exhibit A identifies the pages and lines containing Defendants' confidential information in the following eight deposition transcripts: (1) June 3, 2022 litigation deposition of Anmol Bhargava of American, (2) December 22, 2020 Civil Investigative Demand ("CID") deposition of Mitch Goodman of American, (3) April 28, 2022 litigation deposition of Robert Land of JetBlue, (4) April 11, 2022 litigation deposition of Andrea Lusso of JetBlue, (5) April 29, 2022 litigation deposition of Massimo Mancini of American, (6) June 2, 2022 litigation deposition of Roberta Mehoke of JetBlue, (7) July 21, 2022 litigation deposition of Dorothy Nee of State Street (Defendants move to seal only as to Defendants' own confidential information contained within the transcript), and (8) May 10, 2021 CID deposition of Allysen Roberts of American.

deposition transcripts identified in Exhibit A remain impounded until further order of the Court.<sup>2</sup>

Defendants' request for sealing is narrowly tailored. Defendants seek to seal only the limited portions from the designated deposition testimony that contain the categories of highly sensitive information which Defendants previously identified in their Motion to Seal Trial Exhibits (ECF No. 159 at 2-11), and which Defendants reaffirmed in the Parties' Joint Report Regarding Defendants' Motion to Seal Trial Exhibits (ECF No. 243 at 2-3, 5-6). Defendants incorporate by reference the legal arguments included in their Motion to Seal Trial Exhibits with respect to those categories of information. *See* ECF No. 159 at 2-11.

Defendants have met and conferred with Plaintiffs as required by Local Rule 7.1, and Plaintiffs do not oppose this motion.

Dated: October 27, 2022

Respectfully submitted,

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<sup>2</sup> The Court stated on the first day of trial that it would treat the hard copies of designated deposition testimony that the parties provided the Court as impounded pending a motion to seal from Defendants. Trial Tr. Sept. 27, 2022 at 105:17-106:10.

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**LOCAL RULE 7.1 CERTIFICATION**

Pursuant to Local Rule 7.1, Defendants have met and conferred with Plaintiffs, and Plaintiffs do not oppose this motion.

*/s/ Matthew A. McGee*  
Matthew A. McGee

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document, which was filed with the Court through the CM/ECF system, will be sent electronically to all registered participants as identified on the Notice of Electronic Filing.

*/s/ Matthew A. McGee*  
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